

REMARKS

Applicant thanks the Examiner for withdrawing the rejections of record in the April 20, 2005 Final *Office Action*.

Status of the Application

Claims 1-42 are all the claims pending in the Application. Claims 1-42 stand rejected.

Art Rejection

The Examiner has rejected claims 1-42 under 35 U.S.C. § 103(a) as being obvious over *Garg et al.* (US 6,625,603 B1; hereinafter “*Garg*”) in view of *Krishnaswamy et al.* (US 5,974,421; hereinafter “*Krishnaswamy*”). This rejection is respectfully traversed.

I. The Current Rejection

In the instant *Office Action*, the Examiner again relies upon *Garg* to allegedly teach or suggest almost all of the features of independent claims 1, 6, 10, 17, 22, 24, 27, 30, 34 and 36, but concedes that *Garg* fails to teach or suggest that “the GUID is unique outside of the storage system as well as within the system” (*O.A.*, p. 3). Thus, the Examiner applies *Krishnaswamy*, which discloses a system where objects have a GUID to differentiate themselves from “all other objects on all other computers in the network,” and alleges that one of ordinary skill in the art at the time of the invention (“one of skill”) would have been motivated to modify *Garg* in view of *Krishnaswamy* “because unique identifier [sic] can differentiate from [sic] one object from all other objects on all other computers on the entire network” (*O.A.*, p. 6).

Applicant respectfully disagree with the Examiner’s rejection, at least because:

(A) neither *Garg* nor *Krishnaswamy* teaches or suggests the provision of, e.g., a unique “subject identifier,” or a “globally unique identifier,” that uniquely identifies a “user,” as

specified in independent claims 17, 22, 24, 27, 30, 34 and 36. **Rather, both *Garg* and *Krishnaswamy*'s GUIDs are used to identify objects. Objects are not users in either *Garg* or *Krishnaswamy*.** Rather, as discussed in detail below, *Garg* specifies that a separate USERID is used to identify users, but does not specify that the USERID is a GUID, and *Krishnaswamy* is silent regarding the use of any USERID; and

(B) one of skill would not have been motivated to modify *Garg*'s two-GUID identification system in view of *Krishnaswamy*'s one-GUID system.

II. Independent Claims 17 and 22

Applicant respectfully submits that neither *Garg* nor *Krishnaswamy* (either alone or in combination) teaches or suggests a method or code for “requesting access for a user to a remote resource, wherein the request includes a subject identifier for use in making an access control decision, and wherein **the subject identifier is unique within and outside of the remote resource and identifies the user,**” (emphasis added) as recited in independent claim 17 and 22.

Specifically, Applicant respectfully submits that *Garg* fails to teach or suggest any identifier that “identifies the user” and is “unique within and outside of the remote resource.” Rather, the GUIDs cited by the Examiner as allegedly being “unique” **identify objects in the system 200, not users.** The only features in *Garg* that could be read as identifying users are USERIDs or GROUPIDs, which are not disclosed as being “unique within and outside of the storage system” in any way. Further, Applicants respectfully submit that *Krishnaswamy* is silent regarding any particular unique user identification, and is not cited by the Examiner to show such features.

To support this rejection, the Examiner continues to allege that the USERIDs disclosed in *Garg* are equivalent to the unique subject identifier that identifies a user recited in these claims, apparently simply because “an object defined by the file system service can include properties such as the USERID of the owner of the file” (see *O.A.*, p. 10). **While *Garg* does disclose that: (1) USERIDs can be a property of an object (col. 8, lines 16-19); and (2) objects can be identified by GUIDs (col. 6, line 63 - col. 7, line 5), *Garg* does not ever disclose that the USERIDs themselves are GUIDs, or that they are “unique within and outside of the storage system” in any respect.** In fact, there is simply no logical relation between the GUIDs and USERIDs of *Garg*, as the same USERID could be applied to two different objects with different identifying GUIDs if the same author created both of the different objects. Thus, the Examiner’s continued reliance on USERIDs is not understood.

Further, while the Examiner also indicates that she “is providing more obvious evidence the subject identifier such as GUID identifies the user” (*O.A.*, p. 10), **Applicants can find no such “evidence” anywhere in the *Office Action*.**

III. Independent Claim 24

Applicant respectfully submits that neither *Garg* nor *Krishnaswamy* (either alone or in combination) teaches or suggests a method of identifying a user comprising “sending a request for user information from the protecting reference monitor to the resource manager, the request including a subject descriptor for the user, wherein the subject identifier is a Universal Unique Identifier (UUID); receiving, in response to the request, the user information located based on the subject identifier,” as recited in independent claim 24.

Specifically, as discussed in detail above, the only identifiers of users in *Garg* are USERIDs and GROUPIDs, neither of which *Garg* indicates to be “unique” in any way. Further, Applicants respectfully submit that *Krishnaswamy* is silent regarding any particular unique user identification, and is not cited by the Examiner to show such features.

Additionally, Applicant respectfully submits that *Garg* fails to teach or suggest that the recited requesting and receiving of information on users, as the tabulated USERIDs and/or GROUPIDs are used only for access control in *Garg*.

IV. Independent Claim 27

Applicant respectfully submits that neither *Garg* nor *Krishnaswamy* (either alone or in combination) teaches or suggests an information storage management system where “the resource manager receives a user's request for access to the protected object, the request including a globally unique identifier for the user requesting the access, and in response to the user's request the resource manager sends over the communications channel to an external storage management system a request for information about the user, the request including the globally unique identifier,” as recited in independent claim 27.

Specifically, *Garg* fails to teach or suggest the provision of a “globally unique identifier” for a “user.” As discussed above, the only identifiers of users in *Garg* are USERIDs and GROUPIDs, neither of which *Garg* indicates to be “globally unique” in any way. Further, Applicants respectfully submit that *Krishnaswamy* is silent regarding any particular unique user identification, and is not cited by the Examiner to show such features.

Additionally, *Garg* fails to teach or suggest sending a request to “an external storage management system,” or using a received “globally unique identifier” to retrieve information

about the user in *Garg*. Rather, as discussed above, *Garg* only utilizes USERIDs and GROUPIDs as a static security list for access control.

V. Independent Claim 30

Applicant respectfully submits that neither *Garg* nor *Krishnaswamy* (either alone or in combination) teaches or suggests an information storage management system where “the resource manager receives a user's request for access to the protected object, the request including a globally unique identifier for the user requesting the access, and in response to the user's request the resource manager resolves the globally unique identifier to a user identifier recognized by an external storage management system; the resource manager sending to the external storage management system a request for information about the user, the request including the resolved user identifier; and wherein the resource manager upon receiving a response including user information about the user passes the user information to the access control unit; and based on the user information the access control unit determines whether to grant the subject access to the protected object,” as recited in independent claim 30.

Specifically, *Garg* and/or *Krishnaswamy* fail to teach or suggest the provision of a “globally unique identifier” for a “user,” the subsequent use of a received “globally unique identifier” to retrieve information about the “user” in *Garg*, or sending a request to an “external storage medium,” for at least the reasons discussed above with respect to independent claim 27.

VI. Independent Claims 34 and 36

Applicant respectfully submits that neither *Garg* nor *Krishnaswamy* (either alone or in combination) teaches or suggests either a method or code for accessing a protected object comprising “sending a globally unique identifier for a user to a name resolving device, and

receiving there from information about the user,” and “sending to a storage management system containing an object a request for access to the object, the request including the information about the user,” as recited in independent claims 34 and 36.

Specifically, *Garg* fails to teach or suggest the provision of a “globally unique identifier” for a “user.” As discussed above, the only identifiers of users in *Garg* are USERIDs and GROUPIDs, neither of which *Garg* indicates to be “globally unique” in any way. Further, Applicants respectfully submit that *Krishnaswamy* is silent regarding any particular unique user identification, and is not cited by the Examiner to show such features.

Further, as discussed above, there is no teaching or suggestion of any need to send an identifier to a device to receive information about a user in *Garg*, as *Garg* utilizes USERIDs and GROUPIDs as a static security list for access control.

VII. Independent Claims 1, 6, 10, 17, 22, 24, 27, 30, 34 and 36

Applicants respectfully submit that one of skill would not have been motivated to modify *Garg*’s two-GUID identification system in view of *Krishnaswamy*’s one GUID system.

Specifically, *Garg* discloses a specific identification system used only within a single computer system (as the Examiner concedes). This identification system is discussed in col. 6, line 60 - col. 7, line 6 of *Garg*, which is reproduced as follows:

Object manager 225 maintains and manages objects defined within the system. Objects have properties that are typically used to describe various aspects of the components of the system. Many different types of objects may exist in the system, and, in one embodiment of the invention, each object is assigned two unique identifiers known as a Globally Unique Identifier (GUID) to distinguish it from the other objects. GUIDs are 128 bit numbers and are guaranteed not to be re-used by another application. The first identifier is the Object Type GUID, which identifies the particular type of object being managed by the object manager. The second identifier is the Object GUID, which

uniquely identifies the particular object within a group of objects of the same type.

Thus, it is clear that *Garg* is directed to a specific system utilizing two GUIDs to identify an object **within its discrete system** by its respective object type and location within a group of objects of a similar type. ***Garg* fails to teach or suggest that a single one of these GUIDs would be sufficient to identify the particular object.** Nor does *Garg* teach or suggest that any such single GUID would be desirable in its system.

Regarding *Krishnaswamy*, this reference discloses an addressing system that utilizes a single GUID, which is indicated as being “a unique identifier differentiating one object from all other objects on all other computers in the network.” However, Applicants respectfully submit that *Krishnaswamy* fails to teach or suggest that its single GUID system could be used in *Garg*, or even that such use would be desirable.

Thus, Applicants respectfully submit that neither *Garg* nor *Krishnaswamy* indicate in any way that a single GUID system would be appropriately used in *Garg*. Thus, Applicant respectfully submits that *prima facie* obviousness has not been established with respect to independent claims 1, 6, 10, 17, 22, 24, 27, 30, 34 and 36, since it has long been held the Examiner must “show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for a combination in the manner claimed.” *In re Rouffet*, 47 USPQ2d 1453 (Fed.Cir. 1998). The mere fact that references can be “combined or modified does not render the resultant combination [or modification] obvious unless the prior art also suggests the desirability of the combination [or modification].” *In re Mills*, 916 F.2d 680 (Fed.Cir. 1990); MPEP §2143.01.

In view of all of the above, Applicant respectfully submits that independent claims 1, 6, 10, 17, 22, 24, 27, 30, 34 and 36 are patentable over the applied reference. Further, Applicant respectfully submits that rejected dependent claims 2-5, 7-9, 11-16, 18-21, 23, 25, 26, 28, 29, 31-33 35, 37 and 38-42 are allowable at least by virtue of their dependency.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-42 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-42.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

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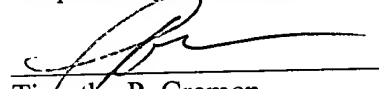
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Respectfully submitted,


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